

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Brillo Landfill - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #5
FINAL POLREP
Brillo Landfill
A27T
Victory, NY
Latitude: 43.1683611 Longitude: -76.6149088

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From: Mark Gallo, On-Scene Coordinator

Date: 4/24/2019

Reporting Period: 8/6/18 through 4/18/19

1. Introduction

1.1 Background

Site Number:	A27T	Contract Number:	EP-S2-15-01
D.O. Number:	0047	Action Memo Date:	4/9/2018
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/6/2017	Start Date:	10/19/2017
Demob Date:	4/18/2019	Completion Date:	4/18/2019
CERCLIS ID:	NYN000203129	RCRIS ID:	NYD980648067
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA Removal Action (RV1) at a former non-hazardous waste Landfill.

1.1.2 Site Description

The Site is a former, inactive, non-hazardous waste landfill approximately 113 acres in size which is overgrown and partially wooded with protected wetlands.

During the 1960s, plating waste from General Motors were believed to be disposed on the site on open ground and later covered with soil and seeded. In the 1970s and 80s, the owner operated a permitted non-hazardous, industrial waste landfill which received sewage treatment plant floatables and industrial grinding silica. Sometime prior to 1980, drums of waste were also deposited on site. In the early 1980s, these drums were removed as a condition of obtaining a non-hazardous waste disposal permit from the New York State Department of Environmental Conservation (NYSDEC). The permitted landfill closed in 1986.

During a 2015 NYSDEC remedial investigation sampling event at the Site, approximately 20 drums were uncovered in an area formerly believed to be a drum staging and disposal area. Historical information indicates the waste material may contain PCBs as well as plating wastes. On September 29, 2017 the NYSDEC requested EPA assistance to address the buried drums at the former drum staging and drum disposal areas which covers an approximate area of 0.5 to 0.75 acres.

1.1.2.1 Location

The Brillo Landfill Site is located on the north side of State Route 370, just west of the Village of Cato, Cayuga County, New York.

Latitude 43.168349 Longitude -76.614948

1.1.2.2 Description of Threat

There is a threat to groundwater from the release of wastes within buried drums at the Site. The initial EPA investigation identified several buried drums and drum carcasses in two areas of concern; former drum staging area and the former drum disposal area. Initial screening of several drums were observed to contain liquids which recorded elevated levels of volatile organic compounds (VOCs) (recorded by a photoionization detector) and elevated levels of LEL (Lower Explosive Level). Previous sampling of soil and groundwater by the NYSDEC, in the two areas of concern, has documented VOCs and PCBs to be present.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In November of 2015, NYSDEC excavated test pits and collected samples at several areas of the 113-acre site. During the NYSDEC remedial investigation, the NYSDEC identified two areas of concern (Drum Staging Area and Drum Disposal Area) in which they uncovered buried drums. Initial screening of those drums reported elevated levels of VOCs. Samples were collected from soil around the buried drums which reported elevated levels of VOCs and PCBs. On September 29, 2017, the NYSDEC referred the two areas of concern to EPA for consideration of a CERCLA Removal Action.

On November 6, 2017, EPA mobilized to the Site with the support of EPA's Emergency and Rapid Response Services Contractor (ERRS) and the EPA's Removal Support Team Contractor (RST) to initiate the removal action with the investigation of the buried drums. On November 7-8, 2017, EPA excavated five former NYSDEC test pit areas which resulted in access to and the sampling of 10 buried drums.

During this initial investigation and sampling event, EPA observed several buried drums and drum carcasses. Drums were observed to have been disposed in a hap-hazard manner, many partially crushed and/or damaged with few drums in upright positions and many drums laying horizontal and/or at varying degrees from upright position. Drums observed in the former drum staging area were found to be deposited at shallower depths and partially in or below the groundwater zone. Drums observed in the former drum disposal area showed less impacts from groundwater however drums in this area were also observed to be damaged and in varying stages of decay.

Both liquids and solids were sampled from the drums accessed during the initial investigation. Samples collected were submitted to an accredited laboratory for analysis. The requested analysis included the following;

- Target Compound List (TCL) for VOCs
- TCL semi-volatile organic compounds (SVOCs)
- Target Analyte List (TAL) for metals plus mercury, cyanide, and hexavalent chromium
- PCBs, Pesticides, and Herbicides
- Full Toxicity Characteristic Leaching Procedure (TCLP) for RCRA hazardous waste determination (VOCs, SVOCs, Pesticides, Herbicides, PCBs)
- RCRA Characteristics of Ignitability, Corrosivity, and Reactivity
- Target Organic Halide (TOX) analysis

At the completion of assessment and sampling activities, EPA secured or sealed all drums sampled and demarcated areas of known buried drums with orange fencing and/or marked areas with caution tape.

On February 22, 2018, EPA received the final sampling report and validated data from the November 2017 sampling event. EPA conducted a review of the data which reported that the contents from seven of the ten drums samples failed TCLP analysis. Six of the ten samples failed TCLP analysis for Trichloroethene (TCE), with one of those samples also reported as failing TCLP for Tetrachloroethylene (PCE). The 6 samples that failed the TCE TCLP analysis included reported levels from 0.88 mg/L to 2,800,000 mg/L. The RCRA regulatory level for TCE is 0.5 mg/L. The seventh sample failed TCLP analysis for chromium. That sample was reported at 29.3 mg/L and the regulatory level for chromium TCLP is 5.0 mg/L.

The contents from one of the drums sampled, and the sample of the surrounding soil reported levels of PCBs exceeding the TSCA regulatory levels. The sample results from the drum contents and surrounding soil were 340 mg/kg (drum liquid) and 1,500 mg/kg (soil). Other hazardous constituents were also reported in the analytical report, but not above the RCRA regulatory levels. Additional hazardous constituents reported include but not limited to; toluene, xylene, ethylbenzene, and nickel.

Following the receipt and review of the analytical data from the November 2017 sampling event, EPA prepared an Action Memorandum to request an increase in funding to continue actions at the Site. The Action Memorandum was approved on April 9, 2018.

2. Current Activities

2.1 Operations Section

August 6 - 14, 2018

ERRS completed drum recovery work in the south-west and south-central areas and advanced north and east into the former drum disposal area. Excavation areas appeared to clean up on 8/6 and 8/7 with few drums/carcasses per area. Several test trenches were excavated through the southeastern, eastern, and northeastern areas of the former disposal area. These test trenches were observed free of any drums or waste materials and reduced the footprint believed to contain buried drums.

On 8/8/18 and 8/9/18 recovery activities continued in the northern and north-central areas of the former drum disposal area. A significant amount of time was also applied to processing drum carcasses and management of on-site soil stockpiles. On 8/13/18 and 8/14/18 recovery work continued in the northern and north-central areas until recovery activities were completed on 8/14/18.

Approximately 635 drums and carcasses were recovered during this period. Contents from 27 of those drums were pumped or over-packed to shippable containers and moved to the drum staging pad for characterization. Approximately 180 cubic yards of solid drum waste material and grossly contaminated soil was recovered and stockpiled increasing the waste solid/soil stockpiles to approximately 550 cu yds. Approximately 2,018 drums and carcasses have been recovered with a final approximate carcass stockpile sized at 400 cu yds. All recovered drums were observed partially crushed and significantly deteriorated.

Some waste characterization samples were received during this period, results from samples collected on 7/23/18 reported PCBs over 500 ppm from one carcass stockpile and soil pile, as well as TCE greater than the TCLP

regulatory level in one soil pile sample. On 8/14/18 additional samples were collected from the final soil stockpiles and carcass piles. These samples were shipped to an accredited laboratory for waste characterization analysis.

RST conducted work zone and perimeter monitoring. No elevated levels were detected at perimeter air monitoring locations. Work zone monitoring recorded some slightly elevated levels of VOCs and monitoring of some drum contents also reported elevated levels of VOCs using a PID monitor. Although monitoring is conducted in the work zone, regardless of monitoring levels, personnel worked in Level B PPE.

On 8/14/2018 ERRS completed drum recovery activities within the two areas of concern at the Site; the former drum staging area and the former drum disposal area. As of August 14, 2018, EPA has recovered and staged the following estimated volumes of waste materials;

- 168 drums pumped or overpacked and moved to the drum staging pad
- 2,018 total drums/drum carcasses
- 550 cubic yards of drum waste and impacted soil
- 400 cubic yards of empty, crushed drum carcasses

August 15 - 22, 2018

Following completion of excavation and drum recovery activities on 8/14/18, ERRS relocated satellite stockpiles to the main staging area along the Site access road for future load-out. Drum bulk groups were finalized into 15 different compatible bulk groups and samples were collected for waste characterization of each bulk group. A request for bids was sent to vendors for the transportation and off-site disposal of soil piles and carcass piles characterized as TSCA and RCRA waste. All waste characterization samples collected during the week were shipped to the lab on 8/15/18 and 8/16/18.

ERRS completed all backfilling and grading activities on 8/16/18. On 8/20-21/18 ERRS completed decontamination of all equipment being demobilized from the Site, worked to cleanup and securely cover all soil stockpiles, organized and staged drum bulk groups in preparation for load-out, and seeded disturbed areas of the Site. All personnel were demobilized from Site on 8/21/18 pending results from waste characterization samples and award of bids for transportation and disposal services.

August 22 – October 12, 2018

During this period ERRS worked to obtain final lab analysis reports from soil, debris (drum carcasses), and drummed waste streams. Results from the laboratory analysis resulted in the soil and debris waste streams being characterized as TSCA and RCRA waste; TSCA PCBs greater than 500 ppm and RCRA D040, trichloroethylene characteristic hazardous waste. PCB analysis reported levels between 730 ppm and 3,100 ppm for soil and debris waste stream samples.

All drummed wastes were characterized as TSCA and RCRA wastes with exception of one drum. Waste Codes determined for drum waste by fixed lab analysis included the following; D001(ignitable), D002 (corrosive), D008(Lead), D019 (Carbon Tetrachloride), D022(Chloroform), D039 (Tetrachloroethylene), D040 (Trichloroethylene), and D043 (Vinyl Chloride). PCB analysis reported for drum waste bulk groups ranged from 0.23 ppm to 49,000 ppm.

Following receipt of final laboratory analysis reports, ERRS worked to solicit and obtain bids for the transportation and disposal (T&D) for soil and debris waste streams. On 9/5/18 T&D bids for soil and debris (carcasses) waste streams were received and evaluated. The selected disposal options include incineration for the soil waste stream and microencapsulation treatment with final landfill disposal of the debris waste stream. All selected options resulted in treatment and final disposal at RCRA permitted facilities. Prior to award of T&D subcontracts, CERCLA off-site compliance checks were conducted with all facilities found to be acceptable to receive waste from the Brillo Site.

ERRS also worked to profile waste and obtain approvals from the Treatment, Storage, and Disposal Facilities (TSDFs). During this process, the selected facility for the soil waste stream required soil wastes to meet a sizing requirement of less than 3 inches, requiring EPA/ERRS to physically screen this waste stream prior to shipping to the TSDF.

During the week of 9/17/18, ERRS received the final laboratory data packages for the drum composite samples and initiated work on subcontract bid packages for disposal of drums. The bid package for the drum waste stream was provided to vendors with responses due back on 10/5/18. Following the receipt of bids from vendors, the bids were evaluated and a vendor was selected. ERRS then initiated work on generating and obtaining waste profile approvals.

On 9/24/18 the waste profile for the debris waste stream was signed and submitted to the TSDF for approval. The debris waste stream profile was approved 10/1/18 at which point ERRS began working to schedule off-site shipment and disposal of this waste stream.

October 15-30, 2018

EPA and ERRS mobilized to the Site on 10/15/18 to initiate debris pile T&D and screening of the soil waste stream. From 10/16/18 through 10/17/18 ERRS loaded nine 40-yard dump trailers which were shipped off-site to be treated via microencapsulation with final disposal in a RCRA permitted landfill. This waste included all debris from all carcass piles generated on-site.

On 10/18/18, ERRS initiated soil waste stream screening activities. Due to the requirements of the TSDF this waste stream could not contain any materials larger than 3 inches in size. The screened soil waste was segregated into three separate stockpiles; waste soil, debris (metal, plastic, etc), and a third stockpile of waste solids from drum recovery activities. The waste solids larger than 3 inches were characterized and later shipped off-site for disposal via incineration. The segregated debris was shipped under the current hazardous debris profile when screening and segregation activities were completed.

Bids for the drum waste stream were evaluated and a vendor was selected for the off-site shipment and disposal of this waste. ERRS worked to prepare drum waste profiles and obtain profile approvals.

The TSDF accepting the hazardous soil required modifications to the approved profile. An amended profile was generated, signed, and submitted and re-accepted by the TSDF on 10/23/18.

Soil screening activities were completed and screened stockpile segregation activities were halted on 10/25/18. The resulting soil, solids, and debris stockpiles were securely covered pending planned disposal activities which ERRS continued working to set up and schedule for the week of 11/5/18.

On 10/29/18 ERRS began decontaminating the soil screener which was demobilized from the Site on 10/30/18. All ERRS personnel were demobilized on 10/30/18 pending the planned 11/5/18 hazardous soil load-out activities.

November 5-20, 2018

ERRS mobilized back to the Site on 11/5/18 to initiate load-out of RCRA/TSCA soil. Approximately 506 tons of soil was shipped off-site from 11/5/18 through 11/9/18. ERRS also continued segregating hazardous solids and debris from the debris pile created from the soil screening activities previously conducted on-site.

During the week of 11/12/18, ERRS shipped approximately 276 Tons of RCRA/TSCA Soil from the Site. The T&D operation for the RCRA/TSCA soil was completed on 11/14/18 with a total of 782.05 tons of RCRA/TSCA waste soil shipped off-site for incineration. On 11/13/18 all drum waste streams were loaded and shipped off-site.

On 11/15/18 and 11/20/18 ERRS completed shipping of the RCRA/TSCA hazardous debris. A total of 160 yds of waste debris was shipped off-site for treatment and disposal.

On 11/21/18 ERRS decontaminated all Site equipment. All personnel and equipment were demobilized from the Site on 11/21/18. With the exception of an approximate 15 yd pile of solids (from screening operation) all other Site work has been completed. ERRS sampled the solids and shipped the samples to an accredited laboratory for waste characterization analysis.

December 12 - 31, 2018

EPA received results from disposal analysis of the final solids waste stream at the Site, a paint like solid material screened from the soil waste stream. The results characterize this waste stream as a RCRA hazardous waste with TCE exceeding the TCLP regulatory levels and a TSCA waste with PCBs reported greater than 500 ppm. With receipt of this data, ERRS drafted a Request for Proposal document for the solids waste stream disposal and initiate the process of obtaining bids and working to plan future off-site disposal for this waste stream.

January 1 – 25, 2019

Due to the Government Shutdown/Lapse in Appropriations, a stop work order was issued for the ERRS task order for work at the Brillo Site.

February – March 2019

ERRS completed bid documents for the hazardous solids waste stream and issued the request for proposals. Bids were received on 3/1/19 and evaluated by ERRS. The OSC reviewed and consented on solids waste stream T&D bids on 3/14/19. Following bid package consent, ERRS initiated award of the bid and worked to obtain approved waste profiles and schedule off-site shipping of the waste.

The waste profile was approved by the TSDF on 4/4/19 and off-site shipping was scheduled for 4/18/19.

April 17-18, 2019

On the afternoon of 4/17/19 ERRS remobilized to site to conduct final load-out of the solids waste stream as well as load-out any remaining non-hazardous, solid waste at the Site. On 4/17/19 ERRS loaded a 30 yd roll-off with non-hazardous, solid waste debris, items or articles brought to the Site and/or utilized at the Site as part of the mitigation activities.

On the morning of 4/18/19 ERRS loaded-out the final truck of RCRA/TSCA hazardous wastes, a total of 14.75 tons of paint/adhesive-like solids were shipped off-site for incineration. Following the load-out ERRS decontaminated the excavator used during the activity and demobilized all equipment and personnel from the Site.

As of 4/18/19, All mitigation activities authorized in the April 9, 2018 Action Memorandum for the Site have been completed with the following calculated totals of waste shipped off-site;

Waste Stream	Quantity
RCRA/TSCA Debris	520 cubic yards
RCRA/TSCA Hazardous Soil	782.05 tons
RCRA and/or TSCA Waste Liquids	7,944 gallons
RCRA/TSCA Hazardous Solids	14.74 tons

See the following Waste Disposition Tables in Section 2.1.3 for information on Site waste streams.

2.1.2 Enforcement Activities

EPA continues working with the NYSDEC on possible enforcement actions related to this Site.

During this reporting period a total of 11 drums were recovered with partial label information observed on the drum, bringing the total count of drums with partial label information to 29. A total of 13 different company names were identified from label information on those drums. This information will be provided to the EPA enforcement team.

2.1.3 Waste Disposition Tables

Hazardous Debris, Soil, and Solids Waste Streams				
Waste Stream	Date	Quantity	Manifest	Treatment/Disposal Facility
RCRA/TSCA	10/16/2018	200 cu yd	019672278 JJK	Microencapsulation/Landfill

Hazardous Debris			019672279 JJK 019672280 JJK 019672281 JJK 019672282 JJK	US Ecology Michigan Disposal Belleville MI (EPA ID: MID000724831)
RCRA/TSCA Hazardous Debris	10/17/2018	160 cu yd	019672283 JJK 019672284 JJK 019672285 JJK 019672286 JJK	Microencapsulation/Landfill US Ecology Michigan Disposal Belleville MI (EPA ID: MID000724831)
RCRA/TSCA Hazardous Debris	11/15/2018	120 cu yd	019672287 JJK 019672288 JJK 019672289 JJK	Microencapsulation/Landfill US Ecology Michigan Disposal Belleville MI (EPA ID: MID000724831)
RCRA/TSCA Hazardous Debris	11/20/2018	40 cu yd	019672290 JJK	Microencapsulation/Landfill US Ecology Michigan Disposal Belleville MI (EPA ID: MID000724831)
RCRA/TSCA Hazardous Soil	11/5/2018	100.38 tons	012670664 FLE 012670604 FLE 012670605 FLE 012670606 FLE 012670607 FLE Shipped to and Loaded into Gondola Car TILX 3160	Incineration Clean Harbors Aragonite Facility Grantsville, UT (EPA ID: UTD981552177)
RCRA/TSCA Hazardous Soil	11/6/2018	103.94 tons	012670649 FLE 012670608 FLE 012670609 FLE 012670610 FLE 012670611 FLE Shipped to and Loaded into Gondola Car FURX 322417	Incineration Clean Harbors Aragonite Facility Grantsville, UT (EPA ID: UTD981552177)
RCRA/TSCA Hazardous Soil	11/7/2018	99.51 tons	012670650 FLE 012670612 FLE 012670613 FLE 012670614 FLE 012670615 FLE Shipped to and Loaded into Gondola Car FURX 322468	Incineration Clean Harbors Aragonite Facility Grantsville, UT (EPA ID: UTD981552177)
RCRA/TSCA Hazardous Soil	11/8/2018	97.43 tons	012670651 FLE 012670616 FLE 012670617 FLE 012670618 FLE 012670619 FLE Shipped to and Loaded into Gondola Car MBKX 287021	Incineration Clean Harbors Aragonite Facility Grantsville, UT (EPA ID: UTD981552177)
RCRA/TSCA Hazardous Soil	11/9/2018	105.38 tons	012670652 FLE 012670620 FLE 012670621 FLE 012670622 FLE	Incineration Clean Harbors Aragonite Facility Grantsville, UT

			012670623 FLE Shipped to and Loaded into Gondola Car FURX 322559	(EPA ID: UTD981552177)
RCRA/TSCA Hazardous Soil	11/12/2018	104.34 tons	012670653 FLE 012670624 FLE 012670625 FLE 012670626 FLE 012670627 FLE Shipped to and Loaded into Gondola Car MBKX 287027	Incineration Clean Harbors Aragonite Facility Grantsville, UT (EPA ID: UTD981552177)
RCRA/TSCA Hazardous Soil	11/13/2018	102.38 tons	012670654 FLE 012670628 FLE 012670629 FLE 012670630 FLE 012670631 FLE Shipped to and Loaded into Gondola Car FURX 322386	Incineration Clean Harbors Aragonite Facility Grantsville, UT (EPA ID: UTD981552177)
RCRA/TSCA Hazardous Soil	11/14/2018	68.69 tons	012670632 FLE 012670633 FLE 012670634 FLE 012670635 FLE Shipped to and Loaded into Gondola Car FURX 322502	Incineration Clean Harbors Aragonite Facility Grantsville, UT (EPA ID: UTD981552177)
RCRA/TSCA Hazardous Solids	4/18/19	14.75 tons	013259226 FLE Transported via Dump Trailer to Aragonite Facility	Incineration Clean Harbors Aragonite Facility Grantsville, UT (EPA ID: UTD981552177)

Drum Waste Stream

Manifest:	018386920 JJK
Shipping Date:	11/13/2018
Disposal Method:	Incineration
Disposal Facility:	Direct to Veolia Environmental Services - Port Arthur, TX (EPA ID: TXD000838896)

Waste Stream	Containers *	Quantity (gallons)	Waste Code **
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, Methyl isobutyl ketone)	3 DM	165	D040
UN1993, Waste Flammable Liquids, NOS (Trichloroethene, PCBs)	1 DM	55	D001, D040, B002
UN1993, Waste Flammable Liquids, NOS (Trichloroethene, PCBs)	7 DF	665	D001, D040, B002
UN2315, Polychlorinated Biphenyls, Liquid	9 DM	495	B002
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, PCBs)	5 DF	475	D040, B002
UN1993, Waste Flammable Liquids, NOS (Trichloroethene, PCBs)	8 DM	440	D001, D005, D008, D040, B003

UN1993, Waste Flammable Liquids, NOS (Trichloroethene, PCBs)	2 DF	190	D001, D005, D008, D040, B003
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, PCBs)	3 DM	165	D040, B003
UN1993, Waste Flammable Liquids, NOS (Trichloroethene, PCBs)	2 DM	110	D001, D008, D040, B003
UN1993, Waste Flammable Liquids, NOS (Trichloroethene, PCBs)	5 DF	475	D001, D008, D040, B003
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, PCBs)	2 DM	110	D008, D040, B003
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, PCBs)	4 DF	380	D008, D040, B003
UN1993, Waste Flammable Liquids, NOS (Methyl isobutyl ketone, PCBs)	5 DM	275	D001, D005, D008, B003
UN1993, Waste Flammable Liquids, NOS (Methyl isobutyl ketone, PCBs)	2 DF	190	D001, D005, D008, B003
UN1993, Waste Flammable Liquids, NOS (Methyl isobutyl ketone, PCBs)	2 DF	190	D001, D005, D008, B003
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, PCBs)	2 DM	110	D008, D040, B003
UN2315, Polychlorinated Biphenyls, Liquid	1 DF	95	B002

Table Notes:

*Container DM (Metal Drum) and DF (Poly Drum)

** Waste Codes D0xx (EPA RCRA Hazardous Waste Code) and B00x (NY State Hazardous Waste Code)

Drum Waste Stream

Manifest:	018386924 JJK
Shipping Date:	11/13/2018
Disposal Method:	Incineration
Disposal Facility:	Through Cycle Chem Inc, Elizabeth NJ (EPA ID: NJD002200046) To Veolia Environmental Services - Port Arthur, TX (EPA ID: TXD000838896)

Waste Stream	Containers *	Quantity (gallons)	Waste Code **
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, Oil)	15 DM	825	D040
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, Oil)	2 DF	190	D040
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, Oil)	7 DF	665	D040
UN2315, Polychlorinated Biphenyls, Liquid	3 DF	285	B002
UN2315, Polychlorinated Biphenyls, Liquid	1 Tote	275	B002
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, PCBs)	5 DF	475	D040, B007
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, Tetrachloroethylene, PCBs)	2 DF	190	D039, D040, B003

NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, Methyl isobutyl ketone, PCBs)	3 DM	165	D019, D022, D039, D040, D043, B003
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, Lead, PCBs)	1 DF	95	D008, D040, B003
NA3082, Environmentally Hazardous Substance, NOS (Nickel, PCBs)	1 DF	95	B007
UN1993, Waste Flammable Liquids, NOS (Xylene, Trichloroethene, PCBs)	1 DF	95	D001, D040, B003
NA3082, Hazardous Waste Liquid, NOS (Trichloroethene, Methyl isobutyl ketone, PCBs)	1 DF	95	D019, D022, D039, D040, D043, B003
Table Notes: *Container DM (Metal Drum) and DF (Poly Drum) **Waste Codes D0xx (EPA RCRA Hazardous Waste Code) and B00x (NY State Hazardous Waste Code)			

2.2 Planning Section

None - As of 4/18/19, All mitigation activities authorized in the Action Memorandum for the Site have been completed.

2.3 Logistics Section

Nothing to report at this time

2.4 Finance Section

On September 25, 2017, A verbal authorization of \$100,000 for mitigation funding and \$50,000 for RST contractor funding was provided by the EPA Region 2 Emergency Response and Remediation Division's Acting Division Director to conduct initial actions at the Site. On September 29, 2017, an initial Task Order was issued to the ERRS Contractor for \$100,000.

On April 9, 2018 an Action Memorandum was approved which confirmed the initial verbal authorization for emergency action, authorized a project ceiling increase, authorized a change in scope, and a 12-month exemption. The April 9, 2018 Action Memorandum increased the project ceiling from \$150,000 to \$1,950,000, of which \$1,350,000 is for mitigation contracting.

On May 3, 2018, the EPA OSC added an additional \$60,000 to the RST Site task assignment. This addition increased RST funding to \$110,000 for Site work.

On July 31, 2018, the EPA OSC added an additional \$90,000 to the RST Site task assignment. This increases RST Funding to \$200,000 for Site work.

On September 11, 2018, the EPA OSC requested an additional \$300,000 to be added to the ERRS Task Order. This funding was from contingency money in the approved Action Memorandum and will be needed to cover costs of disposal activities. This funding was applied to the ERRS Task Order on September 18, 2018.

On November 7, 2018 the OSC requested an additional \$100,000 (available from the Action Memo ceiling) be added to the ERRS Task Order to cover projected costs of future T&D activities. That funding was taken from the un-utilized RST funding column as those funds were not needed for RST to complete their tasking for this project. The ERRS funding increase Task Order modification was approved on 11/14/18, increasing the ERRS ceiling to \$1,750,000.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,750,000.00	\$1,668,000.00	\$82,000.00	4.69%
RST 3 - Removal Support Team Contractor	\$200,000.00	\$195,000.00	\$5,000.00	2.50%
Intramural Costs				
Total Site Costs	\$1,950,000.00	\$1,863,000.00	\$87,000.00	4.46%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information to report at this time

3. Participating Entities

EPA is conducting this action under its CERCLA authority. EPA has been communicating actions with the NYSDEC and will coordinate activities with NYSDEC as necessary. NYSDEC maintained communication with EPA and/or an on-site presence throughout this action.

4. Personnel On Site

EPA Region 2 OSC	1
EPA ERRS Contractor	4-7
EPA RST 3 Contractor	1-2
NYSDEC	1
NYSDEC Contractor	1

5. Definition of Terms

None

6. Additional sources of information

Nothing to report at this time

7. Situational Reference Materials

None at this time

BRILLO LANDFILL

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Pollution Report # 5 Brillo Landfill - FINAL POLREP

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Questions or Comments?

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